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E-filed on May ___, 2013

[Proposed] Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:)	Case No. 13-12464-MKN
)	
PVL-HOLDINGS, LLC)	Chapter 11
)	
Debtor.)	Hearing Date:
)	
)	Hearing Time:

MOTION TO DISMISS CHAPTER 11 CASE

PVL-Holdings, LLC, a Nevada limited-liability company (the “Debtor”), by and through its proposed counsel of the law firm of Matthew L. Johnson & Associates, P.C., hereby submits this motion (the “Motion”) for entry of an order dismissing the Debtor’s Chapter 11 bankruptcy case. In support of this Motion, the Debtor respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory basis for the relief requested herein is Section 1112(b) of title 11 of the United States Code (the “Bankruptcy Code”).

BACKGROUND

3. On March 26, 2013 (the “Petition Date”), the Debtor filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

4. The Debtor remains in possession of its assets and the management of its property as debtor in possession under sections 1107 and 1108 of the Bankruptcy Code.

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1 5. No trustee, examiner, or committee of unsecured creditors has been appointed by
2 the Office of the United States Trustee in this case.

3 6. This matter was originally brought as a voluntary Chapter 11 case by the Debtor.

4 7. The Debtor has entered into certain agreements with its only creditor whereby
5 the Debtor will transfer its property to such creditor in exchange for certain releases. The
6 Debtor believes that its negotiated arrangement with its creditor has eliminated the need for the
7 protections afforded the Debtor under Chapter 11 of the Bankruptcy Code.

8 **BASIS FOR RELIEF**

9 8. Pursuant to 11 U.S.C. § 1112(b), a party in interest may request the Court to
10 dismiss a case under Chapter 11 for cause.

11 9. Based on the Debtor's negotiations with its only creditor to consensually and
12 favorably resolve this matter in its entirety, the Debtor believes that cause has been established
13 to warrant voluntary dismissal of this Chapter 11 case in its entirety.

14 **CONCLUSION**

15 WHEREFORE, the Debtor respectfully requests entry of an order dismissing the
16 Debtor's Chapter 11 case in its entirety, enter a final decree and order closing this Chapter 11
17 case, and grant such other and further relief as is just and proper.

18 DATED this ____ day of May, 2012.

19 MATTHEW L. JOHNSON & ASSOCIATES, P.C.

20
21 /s/ Matthew L. Johnson
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28 [Proposed] *Attorneys for Debtor*